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20 UNITED STATES DISTRICT COURT
21 FOR THE NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION

23 AMERICAN FEDERATION OF
24 GOVERNMENT EMPLOYEES, AFL-CIO;
25 AMERICAN FEDERATION OF STATE
26 COUNTY AND MUNICIPAL EMPLOYEES,
27 AFL-CIO, et al.,

28 Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT, et al.,

Defendants.

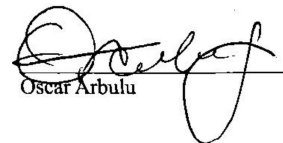
Case No. 3:25-cv-01780-WHA

**SUPPLEMENTAL DECLARATION OF
OSCAR ARBULU**

1 of Common Defense also rely on federal educational assistance offered to veterans, both directly
2 through VA programs offering education benefits to veterans and their families and through student
3 loans and loan deferral, cancellation, and forgiveness programs administered by the Department of
4 Education. For example, the Department of Education processes applications for Total and
5 Permanent Disability Discharge, which relieves disabled veterans from federal student loan
6 obligations entirely.

7 6. The mass terminations at agencies on which military families and veterans rely risk
8 severe disruption to these services. Applications for benefits or questions about available programs
9 will likely be delayed, given the reduction in available staff to respond to questions or provide
10 assistance. According to the Department of Education's website, there is already a pause in
11 processing Total and Permanent Disability Discharge applications at all, which is expected to end in
12 "spring 2025."² Any delays to the resumption of processing caused by mass terminations of
13 Department of Education employees, and any new delays to the processing of other benefits provided
14 by the VA, USDA, and Department of Education, will create additional administrative burdens for
15 members of Common Defense and particularly harm food insecure military families and disabled
16 veterans across the country.

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18 I declare under penalty of perjury under the laws of the United States that the foregoing is true
19 and correct. Executed this 6th day of March 2025 in Davis, California.

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23 Oscar Arbulu
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² See <https://studentaid.gov/manage-loans/forgiveness-cancellation/disability-discharge>.
Supplemental Declaration of Oscar Arbulu, No. 3:25-cv-01780-WHA